IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY

POLICE	NO.:	KC23075364	
PROSECUTOR	NO.:	095476621	FILED
9	OCN:		DIVISION 29
STATE OF MISSOURI,	PL AIN) NTIFF,)	06-Nov-2023 15:57
vs.	LAN)	BY South And DCA
KEITH D ADKINS		5	
14409 CRAIG AVE, Apt. 1004) CASE NO.	2316-CR
Grandview, MO 64030) DIVISION	
DOB:)	
Race/Sex: B/M)	
S.S.N.:)	
T. Company of the Com	EFEN	DANT.)	

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

COMPLAINT

WARRANT REQUESTED

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about November 3, 2023, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Confidential Victim #1, caused the death of Confidential Victim #1 by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

A class A felony carries the punishment range of from ten to thirty years, or life imprisonment, in the Missouri Department of Corrections.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 3, 2023, in the County of

Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition execution of sentence for a period of ten (10)calendar years.

Count III. Assault 1st Degree Or Attempt (565.050-002Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class B felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about November 3, 2023, in the County of Jackson, State of Missouri, the defendant attempted to kill or attempted to cause serious physical injury to Confidential Victim #2 by shooting Confidential Victim #2, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of Confidential Victim #2, and was done for the purpose of committing such assault.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

A class B felony carries a punishment range of from five years to fifteen years in the Missouri Department of Corrections.

Count IV. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 3, 2023, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of Assault in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition execution of sentence for or a period of ten (10)calendar vears.

Count V. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about November 3, 2023, at in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a red Kia Sportage, and, as a result of the above described conduct, Confidential Victim #1 suffered injury or death.

A class A felony carries a punishment range of from ten years up to 30 years, or life imprisonment, in the Missouri Department of Corrections.

Count VI. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 3, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting

In Death Or Injury as charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Count VII. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about November 3, 2023, at the county of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a Red Kia Sportage and, as a result of the above described conduct, Confidential Victim #2 suffered injury or death.

A class A felony carries a punishment range of from ten years to thirty years, or life imprisonment in the Missouri Department of Corrections.

Count VIII. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 3, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term

not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition of sentence execution for period of ten (10)calendar a

Count IX. Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person (575.150-002Y20204801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about November 5, 2023, in the County of Jackson, State of Missouri, law enforcement officers, were attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officers were making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operating a motor vehicle in excess of the posted speed limit, going over 90 miles per hour; not stopping for Stop signs or red lights, traveling into oncoming lanes of traffic, and almost striking multiple vehicles.

A class E felony carries a punishment range of up to one year in the county jail, up to four years in the Missouri Department of Corrections, up to a \$10,000 fine, and/or a combination of fine and incarceration.

Count X. Armed Criminal Action (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 5, 2023, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person charged in Count IX, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or

through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition execution of sentence for period of ten calendar a (10)years.

Count XI. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class D felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about November 3, 2023, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a black 2019 Chevrolet Silverado, an automobile.

A class D felony carries a punishment range of up to one year in jail, up to seven years in the Missouri Department of Corrections, up to a \$10,000 fine, and/or a combination of fine and incarceration.

Count XII. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class D felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about November 5, 2023, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a blue 2017 Hyundai Santa Fe, an automobile.

A class D felony carries a punishment range of up to one year in the county jail, up to seven years in the Missouri Department of Corrections, up to a \$10,000 fine, and/or a combination of fine and incarceration.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

/s/ Shiante McMahon
Shiante McMahon (#66613)
Assistant Prosecuting Attorney
415 East 12th Street
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Kansas City, MO 64106
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WITNESSES:

The State's witnesses as of 11/6/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

CDN: 23-075364

Date. 11-00-2025		CKN23-073304
I,(Name and identify law enforcement officer	, or person having info	ormation as probable cause.)
knowing that false statements on this for	m are punishable b	by law, state that the facts contained herein are true.
I have probable cause to believe that on	07-03-2023 (Date)	, at 12 th Terrace and White Avenue in (Address)
Kansas City, _Jackson	Missouri Keith	D. Adkins
(County)		(Name of Offender(s))
B/M (Description of Identity		committed one or more criminal offense(s).
The facts supporting this belief are as follows: On 11-03-2023 at 1757 hours officers of the E. 13th Street, Kansas City, Jackson Country.	ne Kansas City Mis	ssouri Police Department were dispatched to 6000 eported shooting.
a pole, on the southeast corner of the inters apparent gunshot injuries and was transpor	section of 13th and ted to	the street near a red Kia Sportage that collided with White Avenue. The victim was suffering from , via KCFD/EMS with eceased and his death was ruled a homicide, by
He was transported to	my pronounced dec	located , with a non-life-threatening injury to
_	ere recovere <u>d inclu</u>	ell casings (WMA18 and FC 9mm Luger) from 12th ading, but not limited to, vehicle debris, clothing and was in the rear hatch of the

During this investigation detectives recovered video surveillance from the area. Upon viewing the video surveillance (from three different locations), the following was observed:

- 1752 hours a red Kia Sportage can be seen southbound on White Avenue approaching 13th Street.
- 1754 hours the red Kia Sportage is seen northbound on White Avenue from 14th and White Avenue. The vehicle continues northbound before turning around and goes back southbound on White Avenue.

During this time a black Chevrolet Silverado with a dark colored toolbox in the bed, is seen northbound on White Avenue from 14th Street. The driver of the truck pulls into the middle of intersection of 13th Street and stops, before continuing northbound on White Avenue.

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around and getting

 1754:54 hours the red Kia Sportage is southbound and the black Chevrolet Silverado is northbound. At the intersection of 12th Terrace and White Avenue the black Chevrolet Silverado abruptly stops. The red Kia Sportage avoids colliding with the black Chevrolet Silverado, veering to the right side of the roadway. 1754:59 hours the driver of the Chevrolet Silverado is seen leaning out of the driver window, yelling words to the effect of "Fuck out of my car" before firing two gunshots. The red Kia Sportage collides with a parket truck before continuing southbound. The driver appears to a be a dark complexion black male wearing a blue jacket. 	S
At 13th and White Avenue the red Kia Sportage collides with a pole. The scene southbound on White Avenue.	
The surviving victim stated he was in the red Kia Sportage when a "blacked out truck came out of nowhere and started shooting." He further stated he believed the driver of the truck wanted them to move over due to the red Kia Sportage being in the middle of the roadway. He stated he didn't see the driver, however knows the gunfire came from the driver's side of the black truck.	
Detectives tracked the black Chevrolet Silverado via city cameras. Detectives then responded to the Their video surveillance shows: 1713 hours shows a dark complexion black male with a beard, wearing a blue jacket, khaki pants with blue shoes/white sole and a female in all dark clothing exit the black Chevrolet Silverado, and enter the They make a purchase.	
Both the male and female return to the truck. The male gets into the driver seat, the female in the front passenger seat.	
- 1742:52 the truck exited the parking lot turning eastbound on Truman Road. The distance between	n
On 11-04-2023 at approximately 1430 hours detectives located the black Chevrolet Silverado with a broken driver side window unoccupied and parked in the parking lot of Kansas City, Jackson County, Missouri, which is two blocks west from the homicide location. The VIN on the truck revealed it to be a reporte stolen with a straw and what appeared to be a dipping sauce cup from on the front passenger floorboard.	ed
Using department resources detectives were able to identify the male and as Keith Adkins (
On 11-04-2023 at approximately 1905 hours officers attempted to conduct a vehicle stop of a reported stolen blue Hyundai Sante Fe in the area of 43rd and Oak. The driver fled the area. Officers reported the driver and passenger of the vehicle were Adkins from	e

previous law enforcement contacts. A citizen provided photographs of Adkins

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into the Hyundai Sante Fe at that time. The citizen stated the photographs were taken shortly before the officers attempted to stop the vehicle.

On 11-05-2023 at approximately 1830 hours officers were conducting surveillance in the area of 14th and White Avenue. It should be noted paperwork address of a was recovered from the Kia Sportage.

prior contacts with law enforcement. While conducting surveillance the officers observed Adkins occupying the stolen blue Hyundai Sante Fe while parked in the driveway of contacting the subjects Adkins drove away.

Prior to initiating a car stop of the vehicle officers reported the vehicle was traveling in excess of the posted speed limit on Truman Road as well as weaving in and out of traffic and partially into oncoming traffic. After attempting to conduct a vehicle stop by activating their emergency lights and siren, of the Hyundai Sante Fe, Adkins failed to stop, at which time the officers pursued the vehicle with the intentions of taking Adkins and into custody for the Homicide and Stolen Auto.

The officers reported the following regarding the vehicle pursuit:

"On 11-05-2023 approximately 1910 hours Police helicopter observed the listed suspect vehicle identified as a blue 2017 Hyundai Santa Fe bearing become occupied. Officers [then] confirmed the occupants of the vehicle to be **ADKINS**. The vehicle then became mobile and left the residence traveling west. After a short while, the vehicle travel[ed] west on Truman Road through Topping Avenue. A marked patrol vehicle got behind the stolen vehicle. It should be noted that while prior to activation of our emergency equipment the vehicle traveled west on Truman Road at a rate of speed well above the posted speed limit weaving through incoming and partial oncoming east bound traffic. Officers activated their emergency lights and siren with the intentions of taking **Adkins** into custody.

At the intersection of Truman Road and Cleveland Avenue the vehicle failed to stop, at which time a vehicle pursuit was initiated. The vehicle continued south reaching speeds of 83 miles per hour. The vehicle then made an east bound turn on 23rd Street from Cleveland Avenue. The vehicle then continued east on 23rd Street from Cleveland Avenue, at the intersection of 23rd Street and Jackson Avenue the vehicle turned into oncoming westbound lanes of traffic with other motorists present through a posted red control light reaching speeds of 85 miles per hour. The vehicle made a north bound turn on Poplar Avenue and continued north to 20th Street though the neighborhoods exceed[ing] 65 miles per hour. The vehicle then makes an east bound turn onto 20th Street. The vehicle then travels east on 20th Street exceeding speeds of 65 miles per hour. The vehicle failed to yield for the posted stop signs at 20th and Van Brunt and 20th and Hardesty Avenue. The vehicle makes a north bound turn onto Hardesty Avenue and travels north into oncoming south bound lanes reaching speeds in excess of 82 miles per hour with other motorists present. The vehicle maintains operation in oncoming lanes [going] through the posted red control light at Truman and Hardesty Avenue nearly striking three uninvolved vehicles who were yielding for the red light of Truman and Hardesty Avenue.

The vehicle then travels east on Truman Road reaching speeds of 69 miles per hour. While east on Truman the vehicle fails to yield for the posted red control light, nearly striking a pickup truck at 69 miles per hour.

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The vehicle continued to accelerate east on Truman Road and fails to yield for the posted red control light at speeds of 72 miles per hour. After the vehicle blew the light it made an abrupt evasive maneuver into Truman westbound lanes of traffic to avoid collision with traffic congestion ahead. During the vehicle's evasive maneuver, [it] nearly struck two motorists on the roadway. The vehicle continues to accelerate east on Truman Road reaching speeds in excess of 90 miles per hour prior to entering the Truman bridge passing Corrington Avenue. Due to the excessive speeds and dangerous fleeing [of the] violent felony vehicle, Independence Missouri Police Department was notified though KCPD dispatch. The vehicle continued to travel east over the Truman Bridge reaching speeds in excess of 96 miles per hour weaving through eastbound traffic. The vehicle then entered the city of Independence reaching speeds of 85 miles per hour through the curves just east of Truman Road and Menown Avenue with no regard for other motorists and or the safety of the public. Through the curves the vehicle briefly enters the westbound lanes of traffic traveling east in excess speeds of 68 miles per hour.

While traveling eastbound the vehicle then failed to yield [to] a red control light at Truman Road and Ash Avenue at 86 miles per hour. With no east bound traffic congestion, the vehicle blatantly enters the west bound lanes of traffic and travels east through the posted red control light at Truman Road and Sterling Avenue maintaining its positioning though the west bound lanes of traffic in excess of 66 miles per hour. After the vehicle passes through the intersection it reenters the east bound lanes reaching speeds [in] excess of 92 miles per hour. From Truman Road the vehicle makes a south bound turn on Forest Avenue. While traveling south on Forest Avenue the vehicle enters the north bound lanes in a no passing zone to pass a south bound traveling vehicle just outside of Independence School District at excess speeds of 57 miles per hour. The vehicle then fails to yield for a posted stop sign at Forest and Walnut at 71 miles per hour. The vehicle then makes and eastbound turn on West Short Avenue though the residential neighborhoods in excess of 69 miles per hour, then makes a northwestern turn onto West Lexington Avenue. The vehicle then travels on West Lexington Avenue it fails to yield for a posted stop sign and makes a north bound turn onto North River Boulevard at 72 miles per hour. The vehicle then travels north on North River Boulevard and just north of Maple Avenue the vehicle enters the south bound lanes of traffic to avoid vehicle congestion with south bound motorists approaching. The vehicle makes a north west bound turn onto Truman Road failing to yield for a posted red control sign with motorists present.

The vehicle then continues to accelerate west on Truman Road reaching speeds in excess of 108 miles per hour approaching the intersection of South Crisp Avenue. The vehicle then fails to yield for the posted red control at Ash Avenue in excess of 67 miles per hour nearly striking a pickup truck and trailer traveling north bound on Ash Avenue. The vehicle then attempts to make a south bound turn on South Maywood Avenue from Truman Road. The vehicle came to an abrupt stop due to tire failure and **Adkins** abruptly exits the front driver seat of the vehicle. **Adkins** flees on foot south on Maywood Avenue.

As **Adkins** was fleeing, exited the vehicle from the front passenger seat and fled on foot. An officer observed

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As **Adkins** was being pursued on foot by officer[s], they commanded **Adkins** to stop running and that he was under arrest. **Adkins** resisted the Officers commands and fled behind 10201 East Truman Road. After a foot pursuit **Adkins** was taken into custody."

It should be noted that a third unidentified male occupant fled the vehicle and was not taken into custody.

and Adkins were transported to Police Headquarters, 1125 Locust.
was advised of at 0113 hours. She stated she understood her rights. refused to provide the name(s) of either party she was with, in the stolen vehicle. She stated she was in the front passenger seat. When shown a still shot from the surveillance of her and Adkins, she stated the female in the photograph was her, and the male pictured is "One of the boys" and she has only known him for a couple of weeks. She only knows him as "Homeboy." It should be and Adkins are associated in various
was also shown a still shot of the black Chevrolet she and Adkins were in at the she recognized the truck; however, she thought they were in a Hyundai Sante Fe.
When asked about being at on Friday (11-03-2023) stated the following: She was at the on Friday (11-03-2023) with Adkins . After getting their food Adkins drove her to a house on 14th Street between White Avenue and Topping. She got out of the vehicle as a male she only knows as "Dude" got into the truck with Adkins . She went into the address and took a nap. When she woke up the "boys" were back. denied being in the vehicle with Adkins at the time of the homicide.
On 11-06-2023 at approximately 0218 hours, Adkins was advised of his Miranda rights. Adkins stated he understood his rights and proceeded to speak with detectives without an attorney. Adkins stated that he and have been involved in an intimate relationship for approximately two years and recently learned had been staying with a was not certain on the last name) somewhere off of Truman Rd. He stated he did not know the actual address.
Adkins stated an unknown white male and drive the Hyundai Sante Fe. Adkins claimed that he knew something wasn't right with the vehicle due to the fact that the steering column was popped but he took a chance to drive it anyway since he was only planning on driving a short distance.
When asked if he drove any other vehicles in the past several days or on 11-03-2023, Adkins stated that he and got a ride to the got a ride to the house in a dark blue or black pick-up truck. Adkins stated that the only time he drove the pick-up truck was when asked him to drive the truck in the driveway for him once they got back.
Adkins was shown a still photograph taken from the video surveillance. Adkins confirmed that photograph was of him and the then requested an attorney; the interview was ended.

The case Detective is requesting an arrest warrant in lieu of a summons for the listed offender as the circumstances of the crime was violent in nature. "Adkins" has had prior contacts with law enforcement Officers.

In light of the recent incident and his recent conduct, the case Detective believes the offender is a danger to himself and the public.

Printed Name _	Signature _	
The Court finds probable cause and dire	ects the issuance of a warrant this day of	·
	Judge	
Circuit Court of	County, State of Missouri.	